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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

SEP 28 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Parts 21, 22,)
23, and 25 of the)
Commission's Rules To)
Require Reporting of Station)
Frequency and Technical)
Parameters for Registration)
by the Commission with the)
International Frequency)
Registration Board)

CC Docket No. 92-160

COMMENTS

American Telephone and Telegraph Company ("AT&T") respectfully submits the following Comments in response to the Commission's Notice of Proposed Rulemaking ("NPRM"), FCC 92-336, released July 20, 1992. The NPRM would amend the Commission's rules to require that frequency information necessary to monitor and prevent frequency interference be provided to the Commission for certain radio services on a magnetic diskette.

AT&T agrees that applicants, permittees and licensees should file the information in computer readable format. This will enable the Commission to create an automated database of the information it must report to the International Frequency Registration Board ("IFRB") in order to protect domestic licensees from interference from foreign carriers.

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The proposed rule and the database cannot be implemented until the requirements for submission of the data are specified. These requirements would not, however, be adopted in the proposed rules. Rather, the rules provide for specified Common Carrier Bureau organizations to designate the formats for submission of data.¹ The NPRM includes illustrative formats and requests comments on those formats.

AT&T believes that the illustrative formats are deficient in important respects. They do not provide for submission of all data that would be required for completing a valid interference study and are difficult to complete. For example, Attachment 1 does not require identification of the antenna manufacturer and model number or the radiation pattern, necessary for determining interference potential. Nor does Attachment 1 require identification of the equipment manufacturer, model number and signal specifications necessary for determining appropriate interference objectives. In addition, Attachment 4, File Number 3, does not properly account for satellites with multiple assigned frequency bands involving a common path through the satellite. As a result, either the same mnemonic with different values must be reused

¹ The proposed Part 25 rules on Satellite Communications do not, however, identify the particular organization that will prescribe the requirements. The Commission may wish to amend those rules to add that identification.

within the same file or additional files with redundant information must be created. Neither of these alternatives are efficient.

AT&T suggests that the most efficient way to develop the best data formats is for the Commission to convene meetings among Common Carrier Bureau staff and parties involved in the various services to exchange ideas on that subject. The proposed Commission-industry meetings should also consider the possibility of requiring, or permitting as an option, electronic submission of data rather than furnishing diskettes.² AT&T would be happy to participate in such meetings.

As the Commission-industry work on development of data formats is occurring, the Commission should coordinate with the IFRB through appropriate channels. Such coordination should ensure that the data formats designated by the Common Carrier Bureau staff are compatible with whatever IFRB requirements emerge from on-going IFRB work on its own mechanized system.

² Electronic transmission would be quicker and less burdensome on the data providers than submission of diskettes, and would spare the Commission the task of handling the large number of diskettes called for by the proposed rules.

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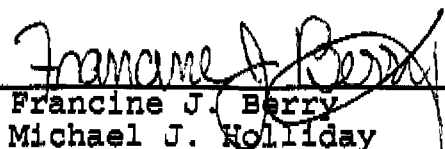
CONCLUSION

AT&T supports new rules providing that data be submitted in mechanized form as designated by Commission staff. The Commission should work with the industry to develop the most useful specifications for the mechanized database and coordinate with the IFRB as that development occurs.

Respectfully Submitted,

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